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November 16, 2022
Project No.: 1070-001J

SUBJECT: Revised Site Management Plan
High Mountain Forest Products
(Former Tool Design Engineering & Manufacturing)
2061 West 2300 South
West Valley City, Utah

Wasatch Environmental, Inc., (Wasatch) has prepared this Revised Site Management Plan (SMP) for the High Mountain Forest Products Facility (Facility) located at 2061 West 2300 South in West Valley City, Utah. This Revised SMP has been completed pursuant to comments issued to Wasatch by the Utah Division of Waste Management and Radiation Control on November 15, 2022. The purpose of this SMP is to present the planned long-term approach for managing residual metal-impacts to soil at the Facility.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

WASATCH ENVIRONMENTAL, INC.



Rebecca Studenka
Senior Project Geologist

Distribution: (1) Electronic – Todd Hammond
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**REVISED SITE MANAGEMENT PLAN
HIGH MOUNTAIN FOREST PRODUCTS
(FORMER TOOL DESIGN ENGINEERING &
MANUFACTURING)
2061 WEST 2300 SOUTH
WEST VALLEY CITY, UTAH 84119
EPA I.D.: UTD047109269**

Project No. 1070-001J

To:

**Mr. Doug Hansen, Director
Utah Department of Environmental Quality
Division of Waste Management and Radiation Control
195 North 1950 West
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Prepared for:

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November 16, 2022

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Exhibit

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**REVISED SITE MANAGEMENT PLAN
HIGH MOUNTAIN FOREST PRODUCTS
(FORMER TOOL DESIGN ENGINEERING & MANUFACTURING)
WEST VALLEY CITY, UTAH**

1. INTRODUCTION

Wasatch Environmental, Inc., (Wasatch) has prepared this Site Management Plan (SMP) to present the planned long-term approach for managing residual metal-impacts to soil at the High Mountain Forest Products (former Tool Design Engineering & Manufacturing) facility, (Facility) located at 2061 West 2300 South in West Valley City, Utah.

This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards" that establish information requirements to support risk-based cleanup and closure standards at facilities for which remediation or removal of hazardous constituents to background levels is not expected to be achieved. The "Owner" (as defined in the Environmental Covenant [EC]) shall comply with the SMP, including provisions relating to the Activity and Use Limitations pertaining to land use limitations and groundwater limitations.

1.1 Site Description

The Facility is 2.26 acres (Tax Parcel Number: 15-22-151-005) located at 2061 West 2300 South in West Valley City, Salt Lake County, Utah (as shown in Exhibit A, Figure 1 and Figure 2). The legal description for the Facility is:

COM N 0°02'35" E 1017 FT & 1760.7 FT W FR CEN SEC 22 T 1S R 1W SL MER S 442 FT S
63°28' W 223.54 FT N 541.86 FT E 200 FT TO BEG. 2.26 AC. 6109-2018 6298-1637 8165-2379
8192-880 9558-8230, 8233

1.2 Site Background

Under the regulatory oversight of the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control (DWMRC), an environmental response project, as defined at Section 57-25-102(5) of the Utah Code Annotated, approved by the DWMRC for the Facility, has been undertaken to address metal-impacted soil at the Facility.

Wasatch prepared a March 29, 2022, Phase I Environmental Site Assessment for the Facility. During the completion of the Phase I Environmental Site Assessment, Wasatch identified the following recognized environmental condition:

- The 1980s release from the Facility to the ditch located south of the on-site building was addressed to the overseeing regulatory agency's satisfaction to industrial standards applicable at that time; however, the agency informed us it will not grant regulatory closure for the metals release to the ditch unless: 1) additional soil samples are collected, 2) the current required chromium analysis is used to analyze the soil samples (hexavalent chromium in lieu of total chromium), and 3) the analytes are detected at concentrations below current applicable action levels.

The Facility has been occupied by High Mountain Forest Products, a lumber distribution business, since 2017. Two buildings, the main office/warehouse building and a storage building, are located in the western and southeastern portions of the Facility, respectively.

Information obtained from the March 2022 report documents that the main Facility building was originally constructed in 1972 for Peterson Filter, a distributor of industrial fillers. The Facility was subsequently occupied by TDEM, a metal working business that manufactured and repaired hydraulic cylinders, oil field

tools, and pump parts, from 1974 to 2016. The storage building was constructed by Tool Design Engineering & Manufacturing (TDEM) in 1975.

As summarized below, numerous soil and groundwater investigations and monitoring activities were performed on the Facility, and former adjoining PDM property between the late 1980s and 2005 by Earthfax Engineering, Inc., Terracon, Pentacore Resources, Stantec, and Wasatch.

On two occasions in the late 1980s, chrome plating vats associated with Facility activities overflowed and spilled into the TDEM building. The overflow material was pumped into a ditch along the southern portion of the Facility. The discharge of the acid solutions transported an undermined amount of dissolved metals into the soils at the base and sides of the ditch. Remediation of the Facility was directed by a Consent Order issued by the Utah Division of Solid and Hazardous Waste (DSHW), currently the Utah DWMRC in 1989.

Site investigation activities were conducted along the ditch in the area south of the TDEM building by Earthfax Engineering, Inc., in 1989 and by Wasatch in the early 1990s. Site investigative activities identified elevated metal concentrations, primarily chromium, in the soils along the ditch in the area south of the Facility. According to information obtained from file review at Utah DWMRC, sometime in early 1992, approximately 270 cubic yards of the contaminated soils from the ditch south of the on-site building were removed and disposed at the Indiana Avenue Landfill without the knowledge or consent of Utah DWMRC. The Utah Attorney General's office subsequently filed a criminal complaint on behalf of the State of Utah. The criminal charges were subsequently resolved in a plea agreement. TDEM Management subsequently recovered the soils from the Indiana Avenue Landfill and the soils were deposited in a landfill approved by the Utah DWMRC.

In 1997, in response to the plea agreements, TDEM began addressing the contamination. In December 1997 and January 1998, a soil and groundwater assessment of the Facility and adjoining west PDM facility was conducted by Terracon. Total chromium was not detected in the groundwater samples collected from the Facility at concentrations exceeding its U.S. EPA Maximum Contaminant Level (MCL) of 0.10 milligrams per liter (mg/L). Total chromium, however, was identified in the groundwater samples collected from the off-site PDM property at concentrations that exceeded its U.S. EPA MCL. Subsequently, four monitoring wells (MW-1 thru MW-4) were installed off-site, on the PDM site.

A memorandum dated April 4, 2002, prepared by Bill Wallner of Utah DWMRC for the Facility was reviewed during the completion of a Phase I Environmental Site Assessment conducted in 2022. Information contained in the memorandum documents that subsequent to soil removal activities from the ditch, confirmation soil samples had not been collected. Based on analytical data collected from previous investigations collected from the area of the ditch, in conjunction with modeling conducted by Utah DWMRC personnel taking into account the estimated soil removal volume, the Utah DWMRC concluded that the remaining concentrations of metals in the ditch soils did not meet residential levels, but were acceptable for an industrial setting. However, the agency recommended collecting soil samples along the centerline of the ditch in three areas previously sampled (Station #3, Station #4, and Station #5) in which estimated concentrations of chromium and lead may still be elevated.

To address the remaining off-site groundwater contamination, Wasatch submitted a September 25, 2003, "Revised SMP" to the Utah DWMRC. The Utah DWMRC approved plan included conducting annual groundwater monitoring at the PDM site. Additionally, Wasatch recommended that TDEM install a pipe in the unnamed ditch to effectively re-route any water from the east beyond the areas of concern (however, information obtained from the previous owner indicates that the pipe was likely never installed).

Wasatch conducted annual groundwater monitoring activities at the PDM site from 2003 to 2005. During the December 2004 and December 2005 annual groundwater monitoring activities, total chromium was not detected in any groundwater samples from the monitoring wells above its U.S. EPA MCL of 0.10 mg/L. Therefore, in Wasatch's January 25, 2006, "Annual Groundwater Monitoring Report" submitted to Utah DWMRC, Wasatch recommended discontinuing the groundwater monitoring activities at the PDM site.

In the spring of 2012, the owner for PDM petitioned the Utah DWMRC to have the four monitoring wells abandoned at the site and PDM was granted this request. On March 30, 2012, Earth Probe personnel abandoned the monitoring wells at the PDM property in accordance with Utah regulations.

Subsequent to the completion of Wasatch's March 2022, Phase I Environmental Site Assessment, Wasatch petitioned the Utah DWMRC to issue a Corrective Action Complete with Controls determination for the Facility. However, Utah DWMRC personnel confirmed that the agency will not issue this determination unless evaluation of current metal concentrations in soil along the centerline of the ditch is conducted. Specifically, soils at the Facility had never been analyzed for hexavalent chromium in accordance with current agency requirements. Agency personnel requested that three soil borings, with soil samples collected at various depths, be completed of former sample areas Station #3, Station #4, and Station #5, where elevated metal concentrations were previously estimated to be present by Utah DWMRC personnel. Utah DWMRC personnel requested that soil samples be submitted for hexavalent chromium and total chromium. In addition, agency personnel requested that soil samples also be analyzed for total lead, as previous investigations had identified elevated lead concentrations in soil at the Facility.

In August 2022, Wasatch supervised the advancement of three soil borings along the centerline of the ditch, in the areas of former samples Station #3, Station #4, and Station #5, where elevated metal concentrations were previously estimated to be present by Utah DWMRC personnel. Three soil samples were collected from each soil boring at depths of 1 to 3 feet bgs, 3 to 6 feet bgs, and 6 to 9 feet bgs. Soil samples were analyzed for hexavalent chromium, total chromium, and total lead.

The analytical results from the investigation activities indicate that hexavalent chromium was detected in soil samples GP-3 (3-6') and GP-3 (6-9') at concentrations of 0.555 milligrams per kilogram (mg/kg) and 1.9 mg/kg, respectively, above its U.S. EPA RSL for Residential Soil of 0.3 mg/kg; however, hexavalent chromium was not detected in any of the soil samples at concentrations that exceed its U.S. EPA RSL for Industrial Soil of 6.3 mg/kg.

Total chromium was not detected in any of the soil samples at concentrations above its U.S. EPA RSL for Residential Soil. The highest observed concentration of total chromium was observed in soil sample GP-3(6-9'), which does correspond to the highest observed hexavalent chromium concentration; however, the highest concentration of hexavalent chromium (1.9 mg/kg) detected in this sample was still more than 3 times less than U.S. EPA RSL for Industrial Soil of 6.3 mg/kg.

Total lead was detected in soil sample GP-1 (1-3') at a concentration of 801 mg/kg, slightly exceeding its U.S. EPA RSL for Industrial Soil of 800 mg/kg; however, the duplicate sample collected from this location had a reported lead concentration at an order of magnitude below this concentration (83.2 mg/kg). Additionally, total lead was detected in the remaining soil samples at concentrations ranging from 7.42 mg/kg to 89.2 mg/kg, well below its U.S. EPA RSL for Residential Soil of 400 mg/kg. Although total lead was detected in one soil sample at a concentration that slightly exceeds its U.S. EPA RSL for Industrial Soil, based on the results from the field duplicate, results from all other soil samples, and the margin of error for the laboratory, it is Wasatch's opinion that total lead is not of concern at the Facility.

The results of the August 2022 investigation indicate that hexavalent chromium was not detected at concentrations in soil above its U.S. EPA RSL for Industrial Soil and concentrations of total chromium and lead at the Facility do not appear to be of concern.

Based on the analytical results, the remaining metal concentrations are within acceptable levels for industrial/commercial use. As remaining metal concentrations do not meet residential standards, the Facility can only be used for industrial/commercial purposes.

Through this SMP and an Environmental Covenant (EC), including necessary activity and use limitations, the risk posed by residual metal impacts in soil at the Facility will be mitigated. The management requirements of the SMP and activity and use limitations of the EC will be protective of human health and the environment.

2. SITE MANAGEMENT

2.1 Activity and Use Limitations

The EC to be recorded against the Facility imposes the following activity and use limitations:

2.1.1 Site Management Plan

The Owner shall comply with this SMP.

2.1.2 Land Use Limitations

The Facility is suitable for commercial and industrial use consistent with applicable local zoning laws. The Facility is not suitable for use as residential or day care.

2.1.3 Soil Limitations

Soils generated from construction or other activities on the Facility shall not be transported off-site and shall remain on the Facility unless approved by the Director based on soil testing results.

2.1.4 Groundwater Limitations

Groundwater from the shallow unconfined aquifer shall not be used for drinking water, irrigation, or bathing purposes. Other uses of groundwater from the shallow unconfined aquifer on the Facility shall be subject to review and approval by the Director prior to implementation.

2.2 Maintenance, Access, and Inspections

Under the EC, the Owner of the Facility shall be responsible for compliance with the SMP and EC.

The Holder under the EC and the Director and their respective authorized agents, employees, and contractors shall have rights of reasonable access to the Facility at any time after the effective date of the EC for inspections and monitoring of the compliance with the EC, and for complying with the terms and conditions of the EC and this SMP. Nothing in this SMP shall be construed as expanding or limiting any access and inspection authorities of the Holder or Director under the law.

2.2.1 Notice

Any party or person desiring to access the Facility under authority of the EC shall provide notice to the then current Owner of the Facility not less than 48 hours in advance of accessing the Facility, except in the event of an emergency condition which reasonably requires immediate access. In the event of any such emergency condition, the party exercising this access right will provide notice to the then current owner of the affected portion of the Facility requiring access as soon thereafter as is reasonably possible.

2.3 Environmental Covenant

An EC containing the above referenced activity and use limitations will be recorded with the Office of the County Recorder of Salt Lake County, Utah.

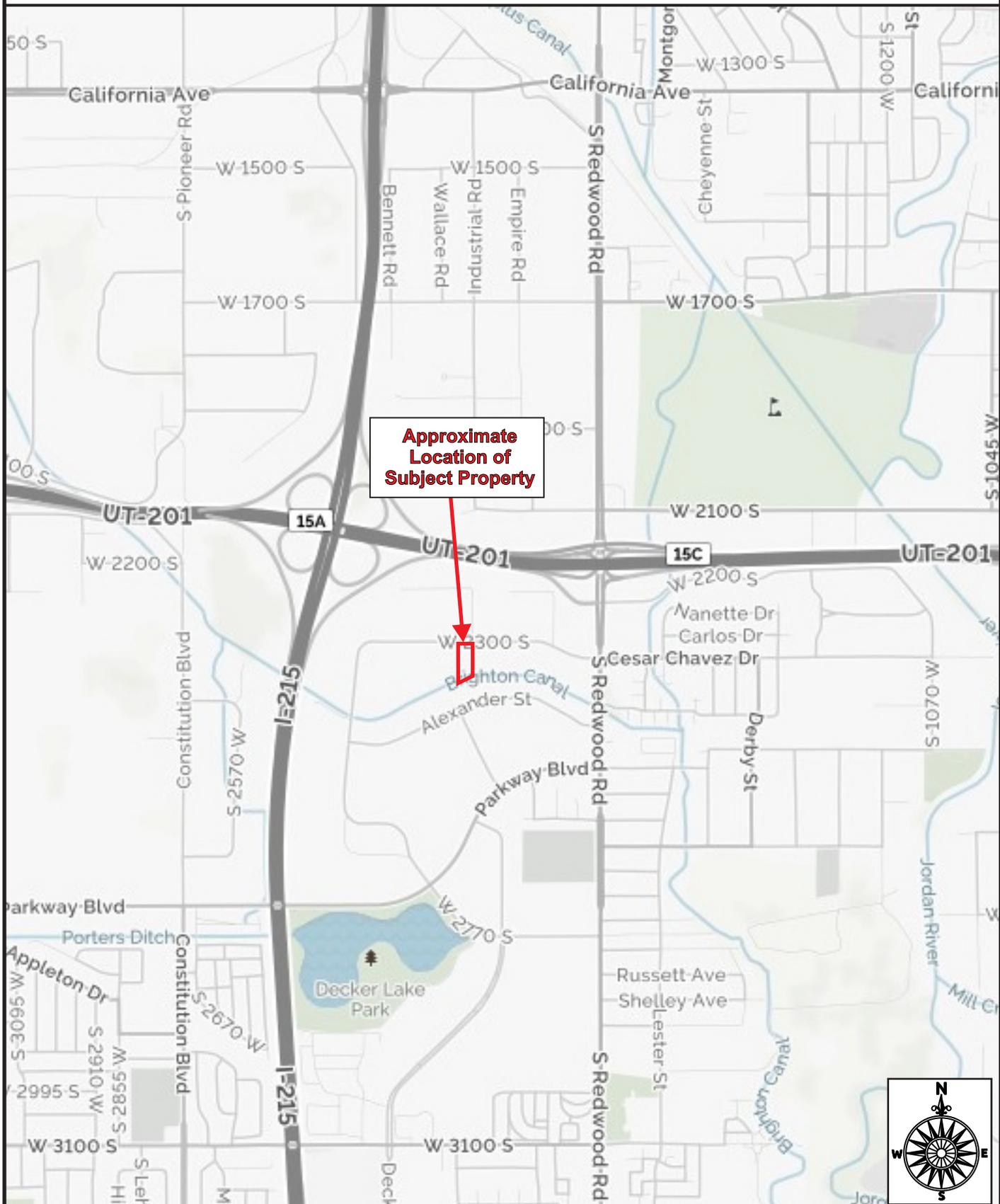
2.4 Site Management Contacts

Inquiries concerning the SMP should be directed to the following:

Todd Hammond
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2061 West 2300 South
West Valley City, Utah 84119
(801) 703-8820

Utah Department of Environmental Quality
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Exhibit A



Vicinity Map

Figure 1

HIGH MOUNTAIN FOREST PRODUCTS WEI 1070-001J



Parcel Map

Figure 2